

**SCOTT**  
SCOTT WORLDWIDE

July 29, 1991

Ms. Cynthia Steele  
Pennsylvania Department of Environmental Resources  
Bureau of Water Quality  
Southeast Regional Office  
Lee Park, Suite 6010  
555 North Lane  
Conshohocken, Pennsylvania 19428

Re: Groundwater Monitoring and Remediation  
Scott Paper Company, Chester, Pennsylvania

Dear Ms. Steele:

This letter is intended to update your office concerning the progress on the groundwater monitoring/remediation near the former xylene and kerosene UST sites at our Chester operations. As you are aware, Scott had been utilizing the services of Groundwater Technology, Inc. as an environmental consultant for the project. In January 1991, Scott Paper Company and Groundwater Technology could not reach mutually agreeable contract terms. As a result, Scott has retained BCM Engineers, Inc. of Plymouth Meeting, Pennsylvania to assist Scott in completing the project. The change in consultants has resulted in a need to revise the original project schedule previously submitted to PADER on June 27, 1990.

Upon review of the existing data, BCM has recommended that a two-phase vacuum extraction procedure be used for the groundwater remediation at the site, rather than bioremediation, as previously proposed. Scott has reviewed the information supplied by BCM and now plans to use vacuum extraction technology.

To complete the groundwater investigation previously proposed, BCM has collected an additional round of groundwater samples from the area surrounding the former xylene and kerosene tank locations. When the laboratory results are received, a report summarizing data collected from July 1990 to the present will be prepared. The report will also include recommendations for remediation using the two-phase vacuum extraction and will be submitted to PADER for review.

Once your office has had an opportunity to review the report and recommendations, Scott would like to meet to discuss the proposed remediation. To avoid additional delays, we suggest that such a meeting be scheduled as soon as possible after your receipt of the report. Scott will contact you subsequent to submittal of the groundwater investigation report discussed above.

An updated schedule for completion of the investigation and initiation of remediation is presented below. This schedule assumes that Scott will be able to meet with PADER within one month of submitting the groundwater investigation report. The schedule also assumes that weather conditions are favorable for construction.

|   |                   |
|---|-------------------|
| Submittal of investigation report       | August 30, 1991   |
| Scott Paper meeting with DER            | October 01, 1991  |
| Submit air discharge permit application | October 01, 1991  |
| Complete engineering design             | November 01, 1991 |
| Receipt of air permits (assumed)        | November 15, 1991 |
| Complete installation of system         | December 01, 1991 |
| System start-up                         | December 01, 1991 |

At the meeting we can resolve any issues and hopefully secure the necessary PADER approvals to begin remediation.

If you have any questions or comments on this project, please call me at 215-499-6041.

Sincerely,

*Anand Kuchibhotla*

Anand Kuchibhotla  
Process Engineer

cc: Mr. R. K. Anderson  
Mr. D. R. Haldeman  
Ms. E. A. Perry - BCM  
Mr. J. R. Platko - Staff

jmh